

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:19-cv-00475-BO

- - - - -X

JASON WILLIAMS, :

Plaintiff, :

v. :

AT&T MOBILITY, LLC, :

Defendant. :

- - - - -X

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Videoconference Video Deposition of

JASON A. WILLIAMS

(Taken by Defendant)

Charlotte, North Carolina

February 23, 2022

Reported by: Andrea Nobrega

Court Reporter

Notary Public

1 Q. So I'm trying to understand based
2 on the employment narrative that you gave,
3 which of those companies relate to your
4 Crypto mining activities, and then we'll
5 drill down into them?

6 But I'm trying to understand from
7 your employment narrative which ones
8 relate to this case. You can answer.

9 MR. LAVIGNE: Same objection.

10 THE WITNESS: I'm sorry, Chris,
11 your microphone broke up. I thought you
12 said you had an objection.

13 MR. LAVIGNE: I said same
14 objection. You can go ahead and answer.

15 THE WITNESS: Okay. At present,
16 PRTI is in the business of mining
17 Cryptocurrency.

18 BY MS. STAGG:

19 Q. Related to the claims that you're
20 making in this lawsuit, which -- was it
21 you personally or another company that was
22 involved in Crypto mining?

23 A. I owned a company, but I was the
24 only owner of called Apollo Kids Mining.

25 Q. So PRTI's Crypto mining activities

1 because they identified me as a target of
2 SIM swaps. I didn't reach out to them.

3 They reached out to me. They knew
4 I was being SIM swapped and they wanted to
5 get my story, and then I don't know what
6 happened after that.

7 **Q. How about other law enforcement**
8 **agencies, have you had any communications**
9 **with them regarding this activity,**
10 **including the SIM swaps, the SWAT attacks**
11 **and the attacks on your email and**
12 **financial accounts?**

13 A. Yes.

14 **Q. Okay. Who have you been in**
15 **contact with?**

16 A. Specifically the night or the
17 afternoon that I was threatened by text
18 message, that if I didn't respond or do
19 something, that my daughter would go
20 missing. I called the police. I was
21 terrified.

22 The police showed up at my house.
23 They did not -- it was such a wild claim
24 that I made, I think it was difficult for
25 the officer to fully contextualize

1 everything.

2 I gave him the number of the FBI
3 agent that I had been working with. That
4 officer called the FBI agent outside of my
5 home and then his mood and demeanor
6 totally changed.

7 He entered my home, sat down with
8 me, uniformed officer with a gun and told
9 me he could not protect me.

10 He would try to get more patrols
11 in my neighborhood for the night or for
12 the next few days, but that if I had a gun
13 I should be ready to use that.

14 He also gave me his card and said
15 that often times officers will provide
16 people personal security when they are
17 off.

18 My daughters and wife were all
19 witness to this. I then sat down with my
20 family and tried to put together some plan
21 for the night, if, in fact, someone came
22 to the house, that I wanted them to stay
23 in their room, and I would try to deal
24 with it as best I could.

25 **Q. And that was local law enforcement**

1 what I should do in terms of informing
2 Morgan Creek Digital Assets, the employees
3 at Morgan Creek, the employees at PRTI,
4 that in the event there is a claim that I
5 was an active shooter or had done some
6 crime to not react, but take their pulse
7 and let law enforcement show up.

8 So it was highly disruptive to,
9 you know, me being a fund manager and
10 having to deal with this.

11 My clients are major universities,
12 healthcare institutions, the public
13 pension in [REDACTED], the [REDACTED]
14 [REDACTED].

15 And as you can imagine, me being a
16 target of SIM swaps and this level of
17 instability, you know, threatened my
18 ability to be a good steward of my
19 responsibilities with these people.

20 It was highly -- it was highly
21 disruptive. It was something that -- it
22 was just a very, very big deal. I wish I
23 had the capacity and the words to explain
24 to you how unnerving this is.

25 This is my life. It's what I

1 worked toward. I don't practice medicine
2 anymore.

3 This is what I do, and for me to
4 have my personal information coopted for
5 these folks to reach out to business
6 clients and to solicit money and try to
7 extract like business deals and doings
8 that have nothing to do with me, it's just
9 terrifying.

10 MR. LAVIGNE: Nancy, before you
11 ask the next question, I want to mark that
12 portion of the transcript confidential
13 that was just answered to the extent that
14 Mr. Williams mentioned his particular
15 clients.

16 MS. STAGG: Sure.

17 Going back to your testimony about
18 your communications with the FBI. So you
19 said that the FBI were the first ones to
20 bring up to you that you could be the
21 subject of a SWAT attack, which obviously
22 would be concerning, Mr. Williams.

23 When did they bring that up to
24 you? Was that before or after the initial
25 SIM swap in this case?

1 THE WITNESS: It was after the SIM
2 swap, and it was when the threats were
3 being escalated.

4 So it was after the threat of
5 kidnapping my middle daughter, Molly, that
6 they had brought that up to me.

7 And there was an active -- they
8 told me at that time there were active
9 bomb threats and SIM swaps occurring in
10 the community.

11 So I guess they monitor the Dark
12 Web and they follow the stuff.

13 But at that point there was an
14 escalation of that type activity by these
15 hackers and SIM swappers.

16 They were making me aware that I
17 could potentially be -- that technique
18 could be used against me.

19 BY MS. STAGG:

20 Q. Okay, but prior to that -- let me
21 ask a different question.

22 Have you ever been the subject of
23 a SWAT attack?

24 A. Never.

25 Q. Do you recall whether that

1 unrelenting wave of this activity. So in
2 that wave of activity was a text message
3 at 6:44 p.m. that if you don't do X, Y, Z,
4 we are going to kidnap your daughter.

5 It was just me handling the AT&T
6 SIM swap. I don't know if you have ever
7 called AT&T or had to be on the phone with
8 an AT&T representative to handle any
9 problem with your account, but these
10 things take hours and they are confusing
11 and then the phone drops or the
12 representative may not be engaged or
13 believe me or want to deal with it, but it
14 is -- it is an absolute time suck.

15 Throw on top of it you are worried
16 about your safety and your family's
17 safety. It's terrifying. I hate to keep
18 using the same word, but it is very scary.

19 **Q. Did you call AT&T in connection**
20 **with the kidnapping threat on your**
21 **daughter?**

22 A. No, but I did share that
23 information in the AT&T store, I believe,
24 at one time when I was handling a SIM
25 swap, that this is the level of problem

1 I wasn't being loud, or I wasn't
2 being disruptive. That's not in my
3 nature. I was simply being matter of fact
4 that I need you guys to take this
5 seriously.

6 I have been a customer for, gosh,
7 15, 16, 17 years at AT&T. Why can't we
8 get this right. I have done my job.

9 I pay you guys. You know, 18
10 years I have been a customer. Stop doing
11 this, you know, because this is the
12 result, someone wants to kidnap my
13 daughter.

14 **Q. I'm trying to understand how you**
15 **believe the SIM swaps were related to the**
16 **kidnapping of your daughter?**

17 A. Well, I will say it again. This
18 was a persistent attack that went over
19 time. It wasn't some asymmetric thing
20 where five months later someone said, you
21 know, X, Y, Z.

22 This was all happening all at once
23 at the same time, and I barely would get
24 some semblance of control over my phone
25 before it would happen again.

1 Even as of today, I have never
2 gotten access to certain accounts back.
3 So that is directly related to the SIM
4 swaps. That's how it happened. That's
5 when it happened. It hasn't happened
6 since.

7 Q. So I know -- we'll jump to the end
8 there.

9 You terminated your relationship
10 with AT&T in about February of 2019,
11 correct?

12 A. I believe so.

13 Q. And you went to Verizon?

14 A. Yes.

15 Q. And are you still with Verizon?

16 A. Yes.

17 Q. And using the same wireless number
18 that you used at AT&T?

19 A. Yes.

20 Q. You ported that number over to
21 Verizon?

22 A. Yes.

23 Q. And have you experienced any SIM
24 swap or SIM attack of any kind since you
25 moved to Verizon?

1 Q. So someone who is following your
2 Twitter account, can see that you make
3 five or six figure purchases of Bitcoin,
4 is that correct?

5 A. Someone --

6 MR. LAVIGNE: -- objection --

7 THE WITNESS: Yeah, someone who
8 lives in my community would see that I
9 drive a Lamborghini. It's equivalent to
10 me.

11 BY MS. STAGG:

12 Q. And you recall posting your Gemini
13 transactions, both buy and sell, correct?

14 A. I don't recall. I don't recall.

15 Q. And Coinbase, you don't recall if
16 you posted any of those transactions,
17 correct?

18 A. I don't recall because I don't
19 have control of Coinbase and haven't for a
20 very long time.

21 So it would be hard for me to have
22 done that. Not to say I didn't, but I
23 don't recall.

24 Q. So you mentioned you don't have
25 control of your Coinbase account. What

1 **are you referring to there?**

2 A. During one of the SIM swaps, the
3 attack was very thorough, and I think we
4 have given you the information related to
5 Coinbase's support detailing what happened
6 to me where my phone was SIM swapped.

7 They went through a process of
8 gaining my email. Then after gaining my
9 email, they were able to engage in either
10 establishing Authy or taking control of
11 Authy.

12 That had a 48 hour or so delay.
13 They went through that delay. Coinbase
14 support asked for physical identification,
15 which they produced, which was the front
16 and back of some ID and a picture of
17 myself.

18 And then they were able to take
19 control of that Coinbase account, which
20 was connected to my First Citizens Bank
21 account.

22 They withdrew two and a half
23 Bitcoin, purchased thousands of dollars of
24 Bitcoin, 30,000 plus of Bitcoin and then
25 attempted and were successful in making

1 withdrawals from my bank account funding
2 that Coinbase account and buying Bitcoin.

3 And I think that's directionally
4 correct and to the best of my like
5 understanding of what happened.

6 Q. Let me go through that since we
7 are on it. I think we still have a little
8 bit of time.

9 So you don't have control -- did
10 you ever try to establish control of your
11 Coinbase account with Coinbase?

12 A. Yes.

13 Q. And what was the result?

14 A. I was unsuccessful. I think that
15 the resolution was that that account was
16 frozen.

17 So it was not -- at the end of it,
18 the hackers don't have it, I don't have
19 it.

20 I tried it one time to set up a
21 new Coinbase account as an investor in
22 Coinbase. I was working with their high
23 net worth group and I wanted to reengage
24 their customer service, test it, and we
25 started going down the pathway of setting

1 it was in the dark ages. Now just a few
2 years later the security features are much
3 more robust and everyone is kind of
4 learning this is a nascent ten year old 12
5 year old kind of space.

6 So, you know, things are
7 progressing, but it's far better today
8 than it was when I was dealing with the
9 SIM swaps related to my, you know, AT&T
10 phone.

11 **Q. Okay. So do you know -- do you**
12 **have any idea where the hackers got your**
13 **ID?**

14 A. Well, you have record of my ID at
15 AT&T. So they could have certainly got it
16 from a computer there or someone that
17 worked at AT&T could have given it to
18 someone.

19 I was made aware by the Dark Web
20 division of the FBI that it's highly
21 probable that my information is on a Dark
22 Web.

23 It could have been through
24 accessing my email, my Drop Box. I have
25 documents there. I have had

1 Q. All right, so let's talk about
2 each one of the SIM swaps that occurred in
3 this case.

4 So as you sit here today, how many
5 SIM swaps do you think happened on your
6 AT&T account?

7 A. Seven or eight.

8 Q. And let me confirm because we
9 started touching around on it. What
10 accounts do you believe were breached as a
11 result of these SIM swaps? We talked
12 about Coinbase.

13 A. Yeah, so this is not
14 comprehensive. This is just what I can
15 recall or what I know of. I believe it
16 was Coinbase, potentially Gemini, my
17 email, my Drop Box, my social media,
18 potentially third-party exchanges, for
19 example, like HitBTC, LinkedIn.

20 I said social media, Twitter,
21 First Citizens -- that's my bank -- yeah,
22 and my personal information at the AT&T
23 store.

24 I absolutely believe that that
25 information -- because you know what it

1 is. I don't. I believe it's everything.
2 It's my social security. It's everything.
3 I think that's been accessed and
4 used against me.

5 Q. Okay. I'm trying to understand
6 all the potential areas of claims that you
7 have as to your account.

8 So we talked about Coinbase.
9 Gemini, can you describe for the record
10 what Gemini is?

11 A. Gemini is an exchange similar to
12 Coinbase. It essentially serves the same
13 function. It's a New York based North
14 Carolina -- excuse me, New York licensed
15 exchange run by the Winklevoss twins from
16 Facebook.

17 Q. Okay. And then you mentioned
18 email. What email accounts were attacked
19 that you believe were the result of your
20 AT&T SIM swaps?

21 A. It was JasonWilliamsEOW@Gmail.com
22 was my personal email.

23 Q. Any other email account that were
24 hacked?

25 A. I don't believe so.

1 Q. Okay. Drop Box you said. Was
2 your Drop Box account hacked?

3 A. Yes, I believe so. It was
4 accessed.

5 Q. And what name was that account in,
6 do you know?

7 A. The username?

8 MR. LAVIGNE: Objection, vague.

9 THE WITNESS: It was my personal
10 Drop Box. I don't -- I don't recall the
11 username. I don't have access to it any
12 longer.

13 BY MS. STAGG:

14 Q. Okay. So you had no access to it
15 since the hack?

16 A. I don't have any access to that
17 Drop Box that was hacked.

18 Q. Okay. Since the hack?

19 A. Yes.

20 Q. Is that a yes?

21 A. Yes, sorry.

22 Q. That's okay.

23 A. I was nodding.

24 Q. That's all right. That's all
25 right. That's why we are here, to remind

1 you.

2 Okay, so while we are on that,
3 what was in the Drop Box account that you
4 can no longer access?

5 A. To the best of my knowledge, it's
6 going to be large files that have to do
7 with business due diligence, private
8 pictures, vacations, things I probably
9 don't want people to see, lots of things I
10 don't want people to see for any number of
11 reasons.

12 Q. Were you storing files in Drop
13 Box?

14 A. That Drop Box account was
15 typically a backup for certain files, but
16 also a place to drop large files for doing
17 due diligence on business deals, vacation
18 photos and things like that.

19 Q. Okay. So did you actually lose
20 access to those documents or just access
21 to the Drop Box files?

22 A. I lost access to that Drop Box
23 that had that information in it. I
24 haven't gotten back into that.

25 So I have a new Drop Box, I

1 believe, but it doesn't have that
2 information in it any longer, if that
3 makes sense to you.

4 Q. Okay. It does. I guess I'm
5 asking a slightly different question.

6 Did you also have all of the files
7 that were in the Drop Box account that you
8 lost access to stored somewhere else?

9 A. No. No.

10 Q. And were these files -- go ahead.

11 A. Those files are too large to be
12 sent through email, so they use Drop Box
13 as the depository.

14 When I lost access to the Drop
15 Box, I don't have access to those files
16 any longer.

17 Q. Okay, that's what I'm trying to
18 ask, because some people only use Drop Box
19 to transmit materials. You were using it
20 to store materials?

21 A. Yes.

22 Q. Okay. And to your knowledge,
23 understanding you don't have access to it,
24 you are saying you no longer have access
25 to the materials that were in those files

1 in any form.

2 So there is not, for example,
3 another copy saved in an Icloud account?

4 A. I don't believe so.

5 Q. Have you undertaken to determine
6 in any way what was in the Drop Box file?

7 A. No, I haven't. I have only tried
8 to, you know, kind of move on in terms of
9 like my business dealings.

10 So anything that, you know, I
11 needed access to or couldn't find, you
12 know, I just kind of lived and continued.

13 I didn't go back and do any kind
14 of forensic analysis of that Drop Box
15 file. Although important, it wasn't as
16 material as the other things I was dealing
17 with at that time.

18 Again, you know, taken separately
19 and put into a vacuum, I may have managed
20 the Drop Box differently. But given all
21 of the things I was dealing with all at
22 once, I did the best I could with how to
23 manage -- you know, prioritizing the
24 issues and managing them.

25 And Drop Box is important, but

1 it's not the same as dealing with Coinbase
2 or Apollo Kids Mining being hacked or my
3 child being potentially abducted or
4 ransomed, and these other things.

5 They take precedence over family
6 vacation pictures or something
7 unfortunately that may come up in the
8 future that's compromising to me.

9 **Q. Have you ever contacted Drop Box**
10 **to try to gain access to that account?**

11 A. I don't recall at this time.

12 **Q. Do you remember at the time that**
13 **the hack occurred, just prior to it, what**
14 **security settings or protection, password**
15 **protection, 2FA you had on that account?**

16 A. To the best of my knowledge, it's
17 probably just password protected. I don't
18 believe there was 2FA on Drop Box. I
19 don't recall specifically.

20 **Q. Do you know whether or not the SIM**
21 **swaps that occurred on your AT&T phone**
22 **affected your Drop Box account? In other**
23 **words, were they -- was your phone used in**
24 **any particular way to attack your Drop Box**
25 **account?**

1 MR. LAVIGNE: Objection, vague and
2 asked and answered.

3 THE WITNESS: Yeah, as I
4 understand it, my Drop Box was accessed by
5 SIM swappers.

6 BY MS. STAGG:

7 Q. How do you know that?

8 A. That could have been a source of
9 my identification being comprised.

10 Q. Well, your Drop Box account you
11 said was password protected, correct?

12 A. That's correct.

13 Q. Okay. Where would you have stored
14 your password, if anywhere, for your Drop
15 Box account?

16 A. I don't store passwords anywhere.
17 They are in my head.

18 Q. Okay. So how do you think the
19 hackers used your ID to access your Drop
20 Box account?

21 A. They don't use your ID to access
22 the Drop Box. They use a forgot your
23 email or forgot your password technique,
24 access that.

25 Now they already have my email, so

1 then they can change the password.

2 It's very easy to do, Mrs. Stagg,
3 once you have control of the phone, SMS
4 and email.

5 Q. So that's what I'm trying to get
6 at. You had said email.

7 So you believe your Drop Box was
8 protected by SMS?

9 A. Well, I don't know. It was
10 protected by password. I can tell you
11 that emphatically, and if I have control
12 of your phone and your email, I can then
13 change your password.

14 So I don't need to know your
15 password. I can make a new password.

16 Q. Right, so you can make a new
17 password, but how is it -- you explain to
18 me what your understanding is of how using
19 your phone and why not just email?

20 Why can't I just use an email to
21 go into Drop Box, forgot your password,
22 change the password without using your
23 phone?

24 A. Right, because I don't have
25 control of your email. So if I have

1 control of your phone, which they did, I
2 can then get control of your email, which
3 they had.

4 Then I can go to Drop Box and put
5 in I forgot my password and Drop Box will
6 send you an email LINK that says click
7 this link to set up a new password, which
8 they did, and then they have a new
9 password, my Drop Box, my phone and my
10 information.

11 It's a very simple process -- only
12 simple retrospectively. You know, during
13 all of this, I had a loose understanding
14 of this.

15 Now it's burned in my brain like I
16 have posttraumatic stress disorder.

17 Q. Okay, now I understand what you
18 are saying. What you are saying is the
19 phone hacks were used to access your email
20 which was then used according to you to
21 change the password on your Drop Box
22 account?

23 A. That's right. Correct, if I was
24 unclear.

25 Q. No, that's fine. I was trying to

1 clarify your understanding of what may
2 have happened, and I was trying to
3 understand how your phone in direct use
4 with your Drop Box account, but you
5 cleared that up for me what your
6 understanding is. Thank you.

7 Now you said that you created a
8 new Drop Box account. Have you made any
9 changes to your security on your Drop Box
10 account after this incident involving loss
11 of the original Drop Box account?

12 MR. LAVIGNE: Objection, vague.

13 THE WITNESS: Yes.

14 BY MS. STAGG:

15 Q. What did you do?

16 A. Well, I stopped using AT&T and I
17 use Verizon, and then I have the security
18 features that I have in place now with
19 Verizon, which seem to be working because
20 I have suffered no SIM swap attack since
21 being a Verizon customer.

22 Q. All right, so we talked about your
23 Coinbase account, your Gemini account,
24 your email account, the Drop Box account.
25 Now let's talk about social media.

1 Were your passwords or access to
2 your social media accounts, and we'll talk
3 about which ones, were affected in your
4 understanding by the SIM swaps?

5 A. Yes.

6 Q. Okay, which ones? Which social
7 media accounts?

8 A. Twitter, LinkedIn specifically.

9 Q. And the Twitter account that was
10 affected was your @GoingParabolic?

11 A. No. At that time it was @FSTMED,
12 same -- It just had a different @ I
13 believe. You can change those, Mrs.
14 Stagg.

15 Q. Okay, sure. So that was the
16 prior --

17 A. Same Twitter account, different @.

18 Q. Got it, all right. Was that the
19 time -- so you were able to recover your
20 Twitter account, correct?

21 A. Yes.

22 Q. All right. And how long did you
23 not have access to your Twitter account?

24 A. That happened a few times. I
25 don't recall the duration of time I lost

1 access to it, but it happened a few times.

2 Q. When you say it happened a few
3 times, did it happen at any time prior to
4 the first SIM swap attack?

5 A. No, it -- all of these events
6 happened in the same sequence in this
7 compressed time frame and there was
8 everything all at once.

9 Q. Okay.

10 A. It's part of --

11 Q. And --

12 A. -- that these things work
13 effectively. It's like, you know, if you
14 are looking at the right hand while I'm
15 shoving my left hand in your pocket, and
16 then you react to the left hand and they
17 are shoving the right hand.

18 That's the kind of -- kind of mess
19 you are in. You lose your email. You
20 know what's coming, because once I don't
21 have control of my email -- that's exactly
22 the process you and I just went over with
23 the Drop Box.

24 That's how they get into my social
25 media. There is no 2FA. It's simply a

1 username and password. You don't know
2 your password. I have your email because
3 I have your phone.

4 Now I will use that recovery link,
5 and then they have my -- they have all of
6 my contacts and my social media,
7 specifically DMs, etc.

8 **Q. And so did you suffer any loss of**
9 **money as a result of losing access to your**
10 **Twitter account?**

11 MR. LAVIGNE: Objection, vague.

12 THE WITNESS: That's hard to say,
13 Mrs. Stagg, because I'm in the business of
14 raising capital and projecting this,
15 whether you agree or not, this personality
16 that is successful in Cryptocurrency and
17 manages money professionally.

18 Have I lost money associated with
19 those hacks, I assume yes.

20 BY MS. STAGG:

21 **Q. Have you undertaken any steps to**
22 **quantify those losses?**

23 A. I have attempted to in some of the
24 psychological or however you want to frame
25 them component of my claim against AT&T.

1 was doing the very, very best I could with
2 a very complicated -- in a very
3 complicated world.

4 We today as Bitcoiners don't agree
5 on security features, custody, etc. So
6 there isn't one clear path to security.

7 BY MS. STAGG:

8 Q. Okay. All right. So let's talk
9 about the SIM swaps. And if you want to
10 refer to the tracker, that's fine.

11 The second entry on the tracker,
12 the first one that has SIM swap next to it
13 says November 5/6, 2018. Hacker pulled
14 off attack while I was in Jamaica.

15 Was this the first time you had
16 encountered a SIM swap on your AT&T
17 wireless phone?

18 A. Yes, I believe so.

19 Q. It says here changed my personal
20 email and two step verification.

21 What are you referring to there,
22 what the hacker did?

23 A. Yeah. So once the SIM swap was
24 completed, my phone said no SIM. It was
25 late at night, I believe, and I think I

1 was leaving Jamaica.

2 So it compounded my problem. We
3 were headed to the airport. So I was
4 trying to deal with this from my wife's
5 phone through the middle of the night and
6 through the following day.

7 They had through SIM snapping my
8 AT&T phone and taking control of my
9 personal email, they were then able to do
10 two-step verification, and get into my
11 Coinbase, apparently, and my Slush Pool
12 account.

13 **Q. Okay. So during this initial SIM**
14 **swap, you believe your personal email,**
15 **which was the Gmail account we talked**
16 **about before, was changed, correct?**

17 **A.** I think that they were able to use
18 two-step verification by using my personal
19 email.

20 **Q. Okay. And then that changed your**
21 **Coinbase and your Slush Pool accounts,**
22 **correct, the passwords on those accounts,**
23 **correct?**

24 **A.** Yeah, once they attack control of
25 my phone and then took control of my

1 retrospectively there are things you could
2 have done differently. What are those
3 things?

4 A. I would have dumped AT&T. It
5 seems to be my achilles heel in this
6 process.

7 Q. And why didn't you dump AT&T after
8 that initial SIM swap?

9 A. Again, retrospectively I would
10 have done a lot of things like what I just
11 said, but, you know, I was a customer for
12 greater than a decade.

13 I had never experienced something
14 like this. I have got ten plus businesses
15 that I'm running, and this is my first
16 experience with this kind of Dark Web
17 hacker kind of thing affecting me so close
18 to home.

19 So I was doing the very, very best
20 I could right here.

21 Q. All right. Did you have any
22 knowledge that anyone from AT&T was
23 involved in conducting the SIM swap hack?

24 MR. LAVIGNE: Objection, vague,
25 also calls for a legal conclusion.

1 because I don't write down my passwords.

2 So it would be very, very
3 difficult, nearly impossible -- well, it
4 would be very difficult to figure out
5 someone's password.

6 BY MS. STAGG:

7 Q. And you don't write these
8 passwords down anywhere? They are in your
9 head?

10 A. That's correct.

11 Q. So you don't store them online
12 anywhere?

13 A. I don't.

14 Q. Do you use the same password or at
15 that point in time were you using the same
16 password on multiple accounts?

17 A. Never.

18 Q. Have you undertaken to determine
19 whether your password was on the Dark Web
20 for any reason?

21 A. I was told by the FBI that my
22 information was on the Dark Web.

23 Q. When did they tell you that?

24 A. I don't recall specifically, but
25 either Pete Mayer or the other officer

1 answered.

2 BY MS. STAGG:

3 Q. And did you restore the Slush Pool
4 account after February 6th?

5 A. Yes, I believe so. I believe that
6 there was -- I believe I created a new
7 Slush Pool account. I didn't restore that
8 one. I created a new Slush Pool account.

9 Q. Okay. Any other SIM card changes
10 that you recall after February 6, 2019?

11 A. I don't recall anything at this
12 time.

13 Q. Do you remember when you ported
14 your service to Verizon from AT&T?

15 A. I don't recall exactly, but it was
16 around -- I think it was around that time.
17 I don't recall exactly.

18 Q. Okay. All right, we can take down
19 Exhibit No. 2. Let me ask you a series of
20 some questions to kind of clear up some of
21 the records here.

22 Did you store a backup of your
23 phone's memory in any account?

24 A. No, not that I know of.

25 Q. Let's talk about the mining

1 business since that seems to -- at least
2 from a financial standpoint some of the
3 area that you are claiming in this case.
4 The mining operation that was connected to
5 the Slush Pool account, was that being
6 done in your name, Jason Williams, or were
7 you doing it through another entity?

8 MR. LAVIGNE: Objection, compound,
9 vague, speculation, argumentative.

10 BY MS. STAGG:

11 Q. Your mining operations that were
12 connected to the Slush Pool accounts that
13 we talked about today, were all done under
14 Apollo Kids Mining, is that correct?

15 A. Yes.

16 Q. So all of the Crypto mining
17 operations that you are alleging were
18 affected by AT&T SIM swaps were actually
19 being conducted by an LLC that you set up
20 named Apollo Kids Mining, is that correct?

21 MR. LAVIGNE: Objection,
22 mischaracterizes previous testimony.

23 MS. STAGG: You can answer.

24 THE WITNESS: Yeah, I believe so.
25 I set up an LLC called Apollo Kids Mining,

1 and that's where -- that's where that
2 business was done.

3 It's a single member LLC. I owned
4 it. It's a single member LLC.

5 BY MS. STAGG:

6 **Q. All right, but it was the LLC that**
7 **owned the Crypto mining rigs, is that**
8 **correct, the 500?**

9 A. That's an accounting question.
10 I'm not an accountant, but I set up an LLC
11 called Apollo Kids Mining, and that's
12 where -- that's where the -- that's where
13 I did the business of mining.

14 **Q. Okay. And that's a Delaware LLC?**

15 A. I believe so.

16 **Q. All right. And is it still**
17 **operational today?**

18 A. Yes.

19 **Q. And Apollo Kids Mining incurred**
20 **all the expenses in connection with Crypto**
21 **mining, correct?**

22 A. Most of them, but some of them I
23 bore personally.

24 **Q. Okay. Which ones were those?**

25 A. I don't know. I would have to --

1 I think I turned over my -- you have all
2 of my financials. So they are all there.
3 I have shown my financials. My accountant
4 turned all that stuff over, tax returns,
5 etc.

6 Q. Okay. But what expenses do you
7 believe that you personally incurred
8 versus the LLC in connection with all of
9 the Crypto mining that Apollo Kids Mining
10 was doing?

11 MR. LAVIGNE: Objection, asked and
12 answered.

13 MS. STAGG: You can answer.

14 THE WITNESS: Yeah, so when I
15 purchased the 1.4 million or so
16 Cryptocurrency miners, I took a loan
17 against my -- like I have a stock account.

18 So I was just trying to be
19 efficient in regards to capital
20 allocation. So I took a loan, bought
21 those rigs and that was my own like trust.
22 So it wasn't the -- a business. It was my
23 trust.

24 So, yeah, so I was personally --
25 somewhat personally funding Apollo Kids

1 Mining. It's a single member LLC that I
2 own, and limited liability companies pass
3 through to mid-member managers anyway. So
4 my money, my business.

5 BY MS. STAGG:

6 Q. Okay. But actually it was your
7 trust that took the loan out against the
8 stock account?

9 MR. LAVIGNE: Objection, asked and
10 answered.

11 THE WITNESS: Yeah, I believe my
12 stock portfolio account is domiciled in my
13 trust, which I'm the sole trustee.

14 BY MS. STAGG:

15 Q. And so the trust borrowed the
16 money to purchase the rigs for Apollo Kids
17 Mining, LLC?

18 A. I as the trustee borrowed the
19 money and allocated it to a business that
20 I owned 100 percent and then I paid that
21 money back 100 percent.

22 Q. Okay.

23 A. Again, I'm not an accountant, so
24 anything I was doing, my accountants have
25 all that information and my bankers. So

1 MR. LAVIGNE: Objection, asked and
2 answered, cumulative, mischaracterizes
3 testimony.

4 MS. STAGG: You can answer.

5 THE WITNESS: Yeah, I'm super
6 confused. I'm the single member manager
7 of an LLC. That LLC I believe -- again,
8 my accountants handle this stuff, is
9 the -- is the company that benefited from
10 the depreciation of those rigs, I believe.

11 That depreciation, though, is
12 passed through to me as the single member.

13 So in aggregate, I own Apollo Kids
14 Mining. I'm the trustee. The mines were
15 purchased by me as the member and the tax
16 benefit, losses, income earned, gained,
17 lost, it all goes back to me, and any
18 accounting of that is handled by my
19 accountants.

20 BY MS. STAGG:

21 **Q. Now, although your Cryptocurrency**
22 **and your Gemini accounts were hacked after**
23 **the SIM swaps, ultimately the hackers were**
24 **not able to steal any currency from your**
25 **Coinbase account, is that correct?**

1 systems all at once, it affected me
2 negatively.

3 I cannot quantify to you exactly
4 what that is, but it is something real and
5 it has down range of effects that I'm
6 still dealing with today.

7 I have been hesitant to disclose
8 them, but I'm dealing with them today.

9 BY MS. STAGG:

10 Q. And what are those?

11 A. You know, affects to my daughters'
12 emotional state, and my own personal
13 relationships with my family.

14 Q. So you're making a claim in this
15 lawsuit for your affects to your daughters
16 and your personal relationship with your
17 family?

18 MR. LAVIGNE: Objection,
19 mischaracterizes testimony, calls for a
20 legal conclusion.

21 MS. STAGG: You can answer.

22 THE WITNESS: I think what I'm
23 saying to you is a threatening a 15 year
24 old to be kidnapped and having police with
25 guns in your house and your father trying

1 to project himself as some type of
2 vigilante who can defend himself with
3 weapons, who is tired, exhausted from
4 this, and it's affected me.

5 It's affected my relationships.
6 It's affected my daughter. It's affected
7 me and my wife. I am making that claim.

8 How do I quantify that? I don't
9 know. Do I think you are liable, yes.
10 Yes, 100 percent.

11 Do I think that these SIM swaps
12 have taken a toll on me, and have affected
13 my businesses negatively, yes.

14 How do I quantify that? I don't
15 know. I'm leaving that up to these
16 attorneys. That's why I persisted.
17 That's why I'm sitting here today and
18 that's why I'm willing to go to trial with
19 this. You have offered settlement. I
20 will not take it.

21 BY MS. STAGG:

22 Q. So you think that AT&T is 100
23 percent liable for all of the threats, DOX
24 attacks and SIM swaps?

25 MR. LAVIGNE: Objection,

1 price of Bitcoin increases, they increase.

2 That is a moving target. Anyway --

3 Q. All right. And so at the current
4 time you don't even have possession of
5 them to sell if you wanted to, is that
6 correct?

7 A. No, I don't know -- no, I do not
8 have possession of them.

9 Q. Now, we talked earlier about the
10 November 2018 hack of your Slush Pool
11 account, and we looked at that chart on
12 Exhibit No. 2, and there were about, you
13 know, potentially three days that were
14 lost in terms of downtime on mining.

15 I understand you may have claims
16 as to whether or not you did not get the
17 rewards for the prior period. But there
18 were approximately three days there.

19 And then we just looked at an
20 additional hack on your Slush Pool account
21 around February of 2019.

22 Is it your recollection that the
23 rigs were up and running by the next day
24 on a new -- on a new Slush Pool account?

25 MR. LAVIGNE: Objection, vague and

1 compound.

2 BY MS. STAGG:

3 Q. Do you have any recollection as to
4 how long you were not obtaining mining
5 rewards after the February 8, 2019 hack?

6 A. I don't recall at this time.

7 Q. But you do recall that you were
8 back up and running in February of 2019 to
9 May of 2019?

10 A. Yeah, I believe that the mine was
11 being wound down or there was work going
12 into winding it down between that time
13 period.

14 Q. Okay. And the decision to stop
15 mining in May of 2019, had nothing to do
16 with the earlier AT&T hacks, did it?

17 MR. LAVIGNE: Objection,
18 argumentative, assumes facts not testified
19 to.

20 MS. STAGG: You can answer.

21 THE WITNESS: Yeah, it was a
22 combination of things.

23 BY MS. STAGG:

24 Q. And what was the combination?

25 A. Well, I was notified that ANEXIO

1 could no longer support the mine. And
2 then given all of the things that I was
3 dealing with, I decided not to reestablish
4 the mine due to the sheer fact that I
5 wasn't sure that I could keep it
6 stabilized.

7 I would have to go through all of
8 the expense again to reestablish it. It's
9 not easy to do. Again, you have to go
10 back to when I was mining. This was
11 not -- this was not a well known, popular
12 thing, and I was already recognized by the
13 FBI as one of North America's largest
14 Cryptocurrency miners with 700,000 watts
15 of mining, which is almost a megawatt.

16 It's a pretty large mine for a
17 single guy to do. So I made the decision
18 at the time, it's the best I could do, to
19 palletize and not start back up.

20 **Q. Okay.**

21 A. But to say it had nothing to do
22 with the AT&T hacks is not accurate.

23 **Q. What part of it did, because you**
24 **had already been mining for four months**
25 **and you had already moved to Verizon,**

1 correct?

2 A. I had no idea that the SIM attacks
3 or SIM swaps would stop. I had no
4 confidence actually that they would stop.
5 I was simply doing all I can to stop them.

6 MR. LAVIGNE: Objection to the
7 previous question as it mischaracterized
8 testimony and was asked and answered.

9 BY MS. STAGG:

10 Q. How could AT&T be responsible for
11 your mining rigs when you're now on
12 Verizon service in May of 2019?

13 A. Because AT&T was responsible for
14 leaking all of my personal information,
15 social security number, identification,
16 all of my email to the Dark Web as per
17 what the FBI told me, and as evidenced in
18 the things that I talked to you about
19 today over the last four hours or so.

20 Q. What evidence do you have that
21 AT&T is responsible for your personal
22 information being leaked on the Dark Web?

23 MR. LAVIGNE: Objection, calls for
24 a legal conclusion. That's what this
25 entire case is about.

1 MS. STAGG: You can answer.

2 THE WITNESS: I think all of the
3 testimony that I have given you to date is
4 me trying to support that fact.

5 That's what I believe --

6 BY MS. STAGG:

7 **Q. But what evidence --**

8 A. -- because my social security
9 number is still the same. I still live at
10 the same place. My name is still the
11 same. My address is still the same. My
12 passport is still the same.

13 All of the information that, you
14 know, potentially was accessed is what it
15 is.

16 My daughters' names are still the
17 same. Their social security numbers are
18 still the same.

19 **Q. But you think that AT&T has your**
20 **social security number available and your**
21 **passports available for someone to access?**

22 MR. LAVIGNE: Objection,
23 mischaracterizes testimony.

24 THE WITNESS: No. Your question
25 was, was AT&T responsible? My answer is,

1 yes, because of all of the things that we
2 have outlined. They haven't gone away.

3 Like the security issue is still
4 there. Regardless of what phone I'm
5 holding right now, the damage is done.
6 The damage persists.

7 My information is on the Dark Web.
8 That's what the FBI told me.

9 And I have gone through all of
10 this due to what I believe to be
11 negligence. I have done everything that
12 AT&T asked me to do, but I was
13 persistently SIM swapped seven or eight
14 times over a time period --

15 BY MS. STAGG:

16 Q. Do you --

17 A. -- personal information.

18 Q. Do you have any information that
19 AT&T put any of your information on the
20 Dark Web?

21 MR. LAVIGNE: Objection, asked and
22 answered, and mischaracterizes testimony.

23 MS. STAGG: You can answer.

24 THE WITNESS: I can only talk to
25 you about what the FBI told me and what

1 the hackers told me in text messages while
2 I was an AT&T customer.

3 They told me that if I didn't
4 respond, they would sell my information on
5 the Dark Web, that they would bring hell
6 to my life.

7 Like you have read all the text
8 messages, that they would attempt to
9 kidnap my daughter. I can only tell you
10 what they told me.

11 I didn't say it. They said it.
12 They said it with my phone, my AT&T phone,
13 as a result of AT&T operators, AT&T
14 employees, AT&T third-party vendors, I
15 don't know.

16 Those are the ones who are
17 facilitating the SIM swaps, the changing
18 of my passwords, the changing of my four
19 digit PIN, the changing of my notes in my
20 file. I didn't do that. AT&T employees
21 did that.

22 I mean did an AT&T employee delete
23 the file that had instructions to not
24 change my SIM card, unless I was at the
25 north Raleigh store? Had to. Had to be

1 an AT&T employee. It wasn't me.

2 BY MS. STAGG:

3 Q. What did the FBI tell you about
4 your personal information being posted on
5 the Dark Web?

6 A. What I have told you.

7 Q. Specifically, what did they tell
8 you?

9 A. They told me that my information
10 was on the Dark Web. That's all I was
11 told.

12 Q. Who told you that?

13 A. I think his name is Peter Ahearn,
14 A-h-e-a-r-n, Peter Ahearn. He is at the
15 Charlotte Division of the Dark Web
16 Division of the FBI, the Charlotte based
17 Dark Web Division of the FBI.

18 Q. And when did he tell you this?

19 A. Sometime after I was SIM swapped.

20 Q. But you can't give us a more
21 specific date?

22 A. I can't. Again, sometimes it's
23 hard to pull this stuff together because
24 everything was happening so fast and so
25 frequent.

1 this case.

2 A. Okay.

3 Q. But if you haven't seen it before,
4 that's fine. Does the date of February 9,
5 2019 give you any recollection that that's
6 when you locked your wallet?

7 A. No, I -- no, I have no idea.

8 Q. All right.

9 A. Yeah, I have no idea.

10 Q. All right, that's fine. Now, why
11 didn't you change your -- I'm sorry, let
12 me ask it this way. Why didn't you
13 terminate your AT&T service after the
14 first SIM swap?

15 A. I had been a customer for ten plus
16 years. I just tried to get it fixed. I
17 had no idea that I was going to be
18 terrorized in the way I was from the
19 extent of time that I was terrorized.

20 I had no -- I'd heard of SIM
21 swaps, but I didn't understand the extent
22 to which I was going to be -- that I was
23 going to be -- you know, that this was
24 going to happen.

25 So I guess that's where I was. In

1 all of these situations, the seven or
2 eight times I was SIM swapped, I was doing
3 the very, very best I can.

4 Operating in a silo, some of this
5 doesn't make sense. It doesn't even make
6 sense to me, but retrospectively I was
7 doing the best I could. There was a lot
8 of stuff going on.

9 Q. All right. Well, you did mention
10 in Exhibit No. 2 around December 3rd you
11 got a Verizon phone as a burner.

12 How come you didn't terminate your
13 AT&T service at that point in time?

14 A. Again, I had -- I have all types
15 of things connected to that AT&T phone.
16 It's not easy just to shut stuff down.

17 Like I think that's the answer,
18 regardless of how chaotic and trashed
19 everything was.

20 Q. Okay. So eventually you did,
21 though, do that in February of 2019,
22 correct?

23 A. I believe that's when I switched
24 to Verizon and stopped using AT&T.

25 Q. When you did that, how much time

1 would you say you spent making those
2 changes to all of your various accounts
3 related to your service?

4 MR. LAVIGNE: Objection, vague.

5 THE WITNESS: I don't recall the
6 exact amount of time.

7 BY MS. STAGG:

8 Q. Do you have any estimate for me?

9 A. I don't recall the exact amount of
10 time. It took time.

11 Q. Well, you kept the phone number,
12 correct?

13 A. Yes.

14 Q. You just ported it over to
15 Verizon?

16 A. Yes.

17 Q. Would you have had to do anything
18 to notify any of your other financial,
19 social media or other online accounts of
20 the fact that you changed carriers?

21 MR. LAVIGNE: Objection, compound.

22 THE WITNESS: No, I actually don't
23 want anyone to know. I don't think it's
24 something I want to socialize. I don't
25 answer the phone.

1 So let me tell you what I do do
2 now that's different. I have not answered
3 my cell phone. I constantly am called
4 by -- I constantly get calls from Duke
5 University and all kinds of weird numbers,
6 and I don't have a voicemail.

7 I don't pick up my phone because I
8 believe that was one of the ways that I
9 was attacked by hackers.

10 So at this point I carry my phone.
11 I use it to manage my social media and I
12 don't answer it, and I don't have a
13 voicemail.

14 And I don't know if that alone has
15 stopped me from being SIM swapped, if it's
16 Verizon's security features that are
17 different than AT&T's, or the additional
18 things I have learned over the seven or
19 eight SIM swaps I have gone through.

20 But at this point, knock on wood,
21 I haven't been SIM swapped.

22 BY MS. STAGG:

23 **Q. Did someone tell you to not have**
24 **voicemail or not answer your phone as**
25 **precautions against SIM swapping? I'm**

1 A. No, not that I recall.

2 Q. And you have not been able to get
3 any records from Slush Pool regarding the
4 accounts that were hacked, correct?

5 MR. LAVIGNE: Objection, vague.

6 BY MS. STAGG:

7 Q. Have you tried to get any records
8 from Slush Pool for your use in this
9 litigation -- you directly, not your
10 attorneys, but you?

11 A. I don't recall.

12 Q. Okay. All right, let's go to
13 paragraph 47. This paragraph talks a
14 little bit about some of your
15 communications with AT&T, and it says
16 following the first SIM swap attack, Mr.
17 Williams contacted AT&T and asked what
18 measures AT&T could take to stop this from
19 happening again.

20 AT&T represented it would add
21 extra security to Mr. Williams' account by
22 making changes and notations in his
23 account, whereby the SIM card associated
24 with an account could only be changed by
25 an in-person request in a specific

1 identified Raleigh AT&T store.

2 I want to ask you about that. Was
3 that something that you requested of AT&T
4 or was offered by someone at AT&T?

5 A. This was done in collaboration.
6 So whilst in the store, I was told that
7 these extra security measures could be put
8 in place, the notations that they put in
9 place.

10 You know, I was the one who said I
11 want to use my passports and only
12 change -- make changes to my account in
13 this store. And the rest of the things
14 here were done collaboratively.

15 It was why I decided to continue
16 to stay with AT&T. I expected this to be
17 resolved, so I could go on and do the
18 other things that I was doing.

19 Having a phone is critical to my
20 business. I have had an AT&T phone for a
21 very long time, expected this to be
22 resolved.

23 Q. Okay. Did -- I noticed that you
24 say here that AT&T represented it would
25 add extra security to your account.